

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION**

IN RE:
CAMP LEJEUNE WATER LITIGATION

This Document Relates To:
ALL CASES

)
)
)
)
)
)
)

Case No: 7:23-cv-897

**UNITED STATES' MOTION
FOR PROTECTIVE ORDER
TO PREVENT THE
DEPOSITION OF DR.
CHRISTOPHER PORTIER**

MOTION

Defendant United States moves this Court, pursuant to Federal Rules of Civil Procedure 26(b) and 26(c), for a protective order to prevent the deposition of former director of the Agency for Toxic Substances and Disease Registry (ATSDR), Dr. Christopher Portier.

In support of this Motion, the United States submits and relies upon its accompanying Memorandum in Support, the Declaration of Joshua G. Carpenito, and the exhibits attached hereto.

Dated: May 23, 2024

Respectfully Submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General
Civil Division

J. PATRICK GLYNN
Director, Torts Branch

BRIDGET BAILEY LIPSCOMB
Assistant Director

ADAM BAIN
Special Litigation Counsel

/s/ Joshua Carpenito
Joshua Carpenito
Trial Attorney, Torts Branch
Environmental Torts Litigation Section
U.S. Department of Justice

P.O. Box 340, Ben Franklin Station
Washington, D.C. 20044
E-mail: Joshua.g.carpenito@usdoj.gov
Telephone: (202) 880-1518
Fax: (202) 616-4473

Attorney inquiries to DOJ regarding the
Camp Lejeune Justice Act:
(202) 353-4426

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2024, a copy of the foregoing document was served on all counsel of record by operation of the court's electronic filing system and can be accessed through that system.

/s/ Joshua Carpenito
Joshua Carpenito